

1 BARRY E. HINKLE, Bar No. 071223  
2 PATRICIA A. DAVIS, Bar No. 179074  
3 KRISTINA M. ZINNEN, Bar No. 245346  
WEINBERG, ROGER & ROSENFELD  
A Professional Corporation  
1001 Marina Village Parkway, Suite 200  
4 Alameda, CA 94501-1091  
Telephone (510) 337-1001  
5 Facsimile (510) 337-1023

6 Attorneys for Plaintiffs

7 ROBERT E. ROSENTHAL, Bar No. 067343  
ANDREW B. KREEFT, Bar No. 126673  
8 BOHNEN, ROSENTHAL & KREEFT  
787 Munros Avenue, Suite 200  
9 P.O. Box 1111  
Monterey, CA 93942  
10 Telephone (831) 649-5551  
Facsimile (831) 649-0272

11 Attorneys for Defendants

12  
13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA

15 THE BOARD OF TRUSTEES, in their ) No. C 10-01492 EDL  
16 capacities as Trustees of the CEMENT ) 10-01493-EDL  
MASON'S HEALTH AND WELFARE TRUST )  
17 FUND FOR NORTHERN CALIFORNIA, )  
CEMENT MASON'S PENSION TRUST FUND )  
FOR NORTHERN CALIFORNIA, CEMENT ) **STIPULATION TO EXTEND**  
MASON'S VACATION/HOLIDAY TRUST ) **DISCOVERY CUT-OFF;**  
18 FUND FOR NORTHERN CALIFORNIA, ) **[PROPOSED] ORDER**  
CEMENT MASON'S APPRENTICESHIP AND )  
20 TRAINING TRUST FUND FOR NORTHERN )  
CALIFORNIA,  
21 )  
Plaintiffs, )  
22 )  
v. )  
23 PAUL T. BECK CONTRACTORS, INC, a )  
24 California Corporation. )  
25 )  
Defendant. )  
26 )

27 Plaintiffs The Board of Trustees, in their capacities as Trustees of the Cement Masons

28

1 Health and Welfare Trust Fund for Northern California, Cement Masons Pension Trust Fund for  
2 Northern California, Cement Masons Vacation-Holiday Trust Fund for Northern California, and  
3 Cement Masons Apprenticeship and Training Trust Fund for Northern California ("Plaintiffs") and  
4 Defendants Paul T. Beck Contractors, Inc. ("Defendant"), by and through the undersigned counsel,  
5 hereby stipulate and request that the Court order that the discovery cut-off date in the above-  
6 entitled action be extended to March 28, 2011. The basis for this request is that Defendant's  
7 Person Most Knowledgeable has been out of town and unavailable for deposition. Furthermore,  
8 Defendant recently informed Plaintiffs that the assets of Defendant were liquidated during a  
9 receivership. Plaintiffs therefore require additional time to investigate the information Defendant  
10 provided and to determine how to proceed in the litigation.

11 It is further stipulated that all other deadlines in the Court's scheduling order of September  
12 21, 2010 (Document 17) shall remain unchanged.

13 Dated: February 23, 2011

14 WEINBERG, ROGER & ROSENFELD  
15 A Professional Corporation

16 By: /s/ Kristina M. Zinnen  
17 KRISTINA M. ZINNEN  
18 Attorneys for Plaintiffs

19 Dated: February 23, 2011

20 BOHNEN, ROSENTHAL & KREEFT

21 By: /s/ Robert E. Rosenthal  
22 ROBERT E. ROSENTHAL  
23 Attorneys for Defendant

24 124118/609573

25  
26  
27  
28

1                           **~~PROPOSED~~ ORDER**  
2  
3

Pursuant to Stipulation, IT IS SO ORDERED.

4                           Dated: Feb. 25, 2011  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

*Elizabeth D. Laporte*

HONORABLE ELIZABETH D. LAPORTE  
UNITED STATES ~~DISTRICT COURT~~ JUDGE